

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHARLOTTE BRENT-BELL,)	
)	
Plaintiff,)	
)	
v.)	Case No. 17 C 7099
)	
THE CITY OF CHICAGO, et al.,)	Judge Joan B. Gottschall
)	
)	Magistrate Judge Jeffrey T. Gilbert
Defendants.)	

**DEFENDANT CITY’S UNOPPOSED MOTION TO EXTEND TIME TO FILE REPLY
BRIEF IN FURTHER SUPPORT OF ITS MOTION TO BIFURCATE PLAINTIFF’S
§ 1983 *MONELL* CLAIM AND STAY DISCOVERY ON THAT CLAIM**

Defendant, City of Chicago (“City”), by its attorney Terrence M. Burns of Reiter Burns, LLP, respectfully requests this Honorable Court grant an extension of time to file its reply brief in further support of its motion to bifurcate plaintiff’s § 1983 claim and stay discovery on that claim. In support of this motion, Defendant City states:

1. Defendant City filed its motion to bifurcate plaintiff’s § 1983 *Monell* claim and stay discovery on that claim on September 13, 2018. (Dkt. 101.)
2. Plaintiff filed her response in opposition on October 8, 2018. (Dkt. 109.)
3. Defendant City’s reply brief is due October 18, 2018. (Dkt. 103.)
4. Defendant City requests an extension of time, until October 22, 2018, to file its reply brief.
5. Other professional obligations have prevented the undersigned from completing the City’s reply in the time requested.
6. Plaintiff has no objection to this motion.

7. This request is in the interest of justice and will not unduly delay the resolution of the disputed issues or otherwise prejudice any party.

WHEREFORE, Defendant City respectfully requests it be granted an extension of time, until October 22, 2018, to file its reply brief in further support of its motion to bifurcate plaintiff's § 1983 claim and stay discovery on that claim

Date: October 17, 2018

Respectfully submitted,

Terrence M. Burns
Elizabeth A. Ekl
Paul A. Michalik
Daniel M. Noland
Katherine C. Morrison
Reiter Burns LLP
311 S. Wacker Drive, Suite 5200
Chicago, Illinois 60606
(312) 982-0090 (telephone)
(312) 429-0644 (fax)

s/ Elizabeth A. Ekl
One of the Attorneys for the City of Chicago
Attorney No. 06242840

CERTIFICATE OF SERVICE

I, Elizabeth A. Ekl, an attorney, certify that on October 17, 2018, I electronically filed the foregoing **Defendant City's Unopposed Motion to Extend Time to File Reply Brief in Further Support of its Motion to Bifurcate Plaintiff's § 1983 *Monell* Claim and Stay Discovery on that Claim** with the Court's CM/ECF system, which simultaneously sent an electronic copy of the same to all counsel of record.

/s/ Elizabeth A. Ekl _____